

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

AGILENT TECHNOLOGIES, INC.	)	
	)	
Plaintiff,	)	
	)	No. 2:25-cv-02101
v.	)	Judge Mark S. Norris
	)	Magistrate Judge Charmiane Claxton
XPEDIENT MANAGEMENT GROUP, LLC	)	
and ST. PAUL FIRE AND MARINE	)	
INSURANCE COMPANY,	)	
	)	
Defendants.	)	
	)	
_____	)	
	)	
XPEDIENT MANAGEMENT GROUP, LLC	)	
	)	
Cross-Plaintiff,	)	
	)	
v.	)	
	)	
ST. PAUL FIRE AND MARINE	)	
INSURANCE COMPANY,	)	
	)	
Cross-Defendant.	)	

**ST. PAUL FIRE AND MARINE INSURANCE COMPANY’S MOTION TO DISMISS  
CROSS-CLAIM BY XPEDIENT MANAGEMENT GROUP, LLC**

Pursuant to Federal Civil Procedure Rule 12(b)(6), Defendant and Cross-Defendant St. Paul Fire and Marine Insurance Company (“St. Paul”) files its motion to dismiss the Cross-Claim (Doc No. 21) filed by Xpedient Management Group, LLC. (“Lessee”). As grounds, St. Paul will show the plain language of the Lease (Doc No. 22) precludes Lessee from making the claims contained in the Cross-Claim. Accordingly, the claims by Lessee against St. Paul must be

dismissed. In support of its motion, St. Paul has filed a memorandum of law in support of its motion to dismiss pursuant to Local Rule 7(a)(1).

Respectfully submitted,

/s/ Paige I. Bernick

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Marine Insurance Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing DEFENDANT ST. PAUL FIRE AND MARINE INSURANCE COMPANY'S MOTION TO DISMISS CROSS-CLAIM was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail and email. Parties may access this filing through the Court's electronic filing system.

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This 17<sup>th</sup> day of March, 2025.

Paige I. Bernick